



Air Quality Permitting Statement of Basis

September 27, 2004

Tier I Operating Permit No. T1-040024

Mountain Home AFB, Mountain Home

Facility ID No. 039-00001

Prepared by:

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AIR QUALITY DIVISION**

FINAL AMENDED PERMIT

Public Comment / Affected States / EPA Review Summary

In accordance with IDAPA 58.01.01.381.02.c, Rules for the Control of Air Pollution in Idaho, DEQ may incorporate administrative amendment changes into the Tier I operating permit without providing notice to the public or affected States provided that DEQ designates any such administrative permit amendment as having been made pursuant to Section 381. In doing so, DEQ must submit a copy of the revised permit, or an addendum, to the EPA and sent the original to the permittee. These actions will be taken as part of the issuance process for this permit.

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.300, Rules for the Control of Air Pollution in Idaho, for issuing a Tier I operating permit.

2. FACILITY DESCRIPTION, FACILITY/AREA CLASSIFICATION

The facility description and the facility/area classification are not changed as part of this administrative amendment.

3. APPLICATION SCOPE

On August 4, 2004, DEQ received a request from the Mountain Home AFB for an administrative amendment to the Tier I operating permit. The request is to change the names of the responsible official and the facility contact.

4. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this action.:

4.1. Emissions Inventory

The emission inventory for the Mountain Home AFB is not changed by this administrative amendment.

4.2. Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this Tier I operating permit.

IDAPA 58.01.01.381.02.a Tier I Administrative Permit Amendments

This action is an administrative amendment to change the name of the responsible official and to implement other similar minor administrative changes into the Tier I operating permit.

IDAPA 58.01.01.381.02.c Tier I Administrative Permit Amendments

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4.3. Fee Review

The Mountain Home AFB is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

5. PERMIT CONDITIONS

This section summarizes the changes made to the Tier I operating permit as part of this administrative amendment.

On the permit cover page, the responsible official name was changed from Colonel Blair Hansen to Colonel Charles Shugg. The facility contact name was changed to Ken Donley.

This section summarizes the changes made to only the Tier I operating permit as part of this administrative amendment.

1. General Provision 21.c.ii and 21.c.iii were changed to be consistent with the rules for annual compliance certification as specified in the February 5, 2004 revision to IDAPA 58.01.01.322.11. the existing conditions appear as follows:
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Permit Condition 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
 - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;

The amended permit conditions appear as follows:

- 21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit.
- 21.3.3 The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Paragraph 21.3.2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR 64 occurred;

2. Permit Condition 21.a was changed to more accurately reflect the annual compliance certification reporting period. In particular, the reporting period was established as November 1 to October 31 of each year.
3. Permit Condition 24 was changed to more accurately reflect the reporting periods for semiannual monitoring reports. In particular, the reporting periods were established as November 1 to April 30 and May 1 to October 31.

6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.381.02.c, *Rules for the Control of Air Pollution in Idaho*, DEQ may incorporate administrative amendment changes into the Tier I operating permit without providing notice to the public or affected States provided that DEQ designates any such administrative permit amendment as having been made pursuant to Section 381. In doing so, DEQ must submit a copy of the revised permit, or an addendum, to the EPA and sent the original to the permittee. These actions have been taken as part of the issuance process for this permit.

7. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that the Mountain Home AFB be issued amended Tier I No. T1-040024. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

BR/CM/sd

Permit No. T1-040024

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